CHEMICALS GROUP

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J. H. ARNOLD — ALLENTOWN

R. F. GASAWAY — ELKTON

ORIGINAL (Rec)

May 26, 1971

CORPS OF ENGINEER PERMITS -
DISCHARGES INTO NAVIGABLE WATERWAYS-
REFUSE ACT OF 1899

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The major portion of the Elkton plant's waste wat[illegible]r from the cleaning of reactor's, filters, storage tanks [illegible]d in the production and warehousing of polyvinyl aceta[illegible]te waters are collected in hold tanks, the pH is checked and adjusted to a pH between 5.5 and 8.5 and then discharged into the Town of Elkton's municipal sewage treatment plant at a maximum rate of 8.0 gal. per minute. The discharge from the municipal treatment plant is into Big Elk Creek which flows into the Chesapeake Bay.

In addition to the wash waters described above, the Elkton plant also discharges city water from process vessel cooling jackets and steam jets, and its sanitary wastes, directly into the sanitary sewer system.

Approval by the Town to discharge these waste waters into the municipal treatment plant is contained in a Memo of Agreement dated January 30, 1968 and is also covered by the State of Maryland, Department of Water Resources Certificate of Approval # 1968 - 19.

From Mr. Kramer's memo of 5/18/71 and item d-2-a of the attached Exhibit II, we conclude that at this time a Corps of Engineers Permit is not required since these waste waters are discharged into a municipal sewage treatment plant.

The second source of waste water at the Elkton plant is from the manufacture of Dibutyl Maleate. The composition of the waste water is estimated to be:

Water	93%
NaOH	3
Na_2SO_4	2.5
N-Butyl Alcohol	1.5
	100.0%

At the time the agreement was made with the Town of Elkton and Certificate of Approval # 1968-19 was received from the Dept. of Water Resources, these waste waters were being discharged into the municipal sewage treatment plant. In 1969, in order to provide an alternate method of disposing of our industrial waste waters, Certificate of Approval #1969-21 was obtained from the Dept. of Water Resources granting permission to dispose of the waste waters into abandoned quarry pits on the property of Maryland Sand and Gravelstone Co., such disposal to be on an intermittent or total basis as conditions require. The approval also covers disposal of segregated waste waters from our Ester Unit (the waste water described above) on a continuous basis. The Elkton plant has been using the quarry pits continuously for disposal of the Ester Unit waste waters and occasionally for the disposal of emulsion waste waters which might prove difficult to handle in the sanitary sewer system.

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CORPS OF ENGINEER PERMITS - Cont'd.

ORIGINAL
(Red)

However, as of the first part of this month, the quarry operator stopped taking any of our waste waters until he resolves an odor complaint received from a neighbor and, depending upon the outcome, may not accept the waste waters in the future.

If the Water Unit waste waters are accepted by the quarry operator, a Corps of Engineers Permit would not be required since they would not enter a navigable waterway. If they are not hauled to the quarry, possibly disposal could be returned to the sanitary sewer although we would anticipate eventual complaints.

R. F. Janaway

RFJ/cd
CC: Agger, J. H. - Phila.
Barr, J. T. - C.C.
Carey, T. L. - Pensacola
Fernengel, F. H. - C.C.
Watson, H. L. - C.C.
Kramer, J. P. - Pensacola